

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**RYAN FARACE and
JOSEPH FARACE**

Defendants.

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CRIMINAL NO. CCB-21-294

CONSENT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

Comes now the United States of America, by and through its counsel, Erek L. Barron, the United States Attorney for the District of Maryland, and Dana J. Brusca, Assistant United States Attorney for said district, and with the consent of counsel for the Defendant, respectfully submits this Consent Motion to Exclude Time Under the Speedy Trial Act.

1. On August 3, 2021, a one-count indictment was returned against the Defendants, Ryan and Joseph Farace, for Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). ECF No. 1.

2. On October 8 (Ryan) and October 6 (Joseph), 2021, the Defendants had their initial appearances and Ryan Farace further entered a plea of not guilty. ECF Nos. 11, 17, 18.

3. The Speedy Trial Act provides that the trial of the defendant shall commence within seventy days “from the filing date (and making public) of the information or indictment.” 18 U.S.C. § 3161(c)(1). However, pursuant to 18 U.S.C. § 3161(h)(7)(A), any delay resulting from a continuance is excluded for speedy trial purposes if based on a finding that the ends of justice

served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. The circumstances of this case require a continuance under the Speedy Trial Act. Here, discovery is somewhat voluminous and require provision of hardware from the defense to the government. The defendants need time to review this discovery, and the parties need time to determine if resolution of this matter can be reached short of a trial.

5. Defendants' counsel, David Walsh Little and Gerald Ruter, consent to the Speedy Trial Act exclusion requested by this motion.¹

WHEREFORE, with the consent of counsel for the Defendants, counsel for the Government requests that the Court exclude all time, pursuant to 18 U.S.C. § 3161(h)(7)(A), from November 8, 2021 through December 20, 2021 under the Speedy Trial Act.

Respectfully submitted,

Erek L. Barron
United States Attorney
District of Maryland

By: /s/
Dana J. Brusca
Assistant United States Attorney
United States Attorney's Office
District of Maryland

¹ The parties discussed the exclusion some weeks ago, but this motion was inadvertently not filed until today.